



DEFENSE LOGISTICS AGENCY
HEADQUARTERS
CAMERON STATION
ALEXANDRIA, VIRGINIA 22304-6100



IN REPLY
REFER TO
MMSC

18 MAY 1995

DOD-4160.21-M-95-07

SUBJECT: MMSC Numbered Letter 95-07, PCP-Treated Wood Products

TO: Recipients of DoD 4160.21-M, Defense Reutilization and Marketing Manual.
Change 95-07.

This numbered letter is directive in nature and expires 1 year from the date of this letter unless sooner superseded or rescinded.

1. The purpose of this numbered letter is to incorporate new policy into the Defense Reutilization and Marketing Manual, DoD 4160.21-M, Chapter VIII.
2. Pending accomplishment of a formal publication, insert the following as paragraph B76 (currently in a reserved status):

"76. Pentachlorophenol (PCP) treated wood products.

"a. Disposal of PCP-treated wood products is not currently regulated by Federal RCRA regulations. However, disposal of PCP-treated wood products/pallets shall be coordinated with (1) local natural resources and environmental affairs offices to ascertain and strictly adhere to state and local environmental compliance regulations, and (2) the servicing DRMO to ascertain R/T/D/S potential.

"b. Following the coordination, the generating activity shall decide the method of disposal: (1) turn-in to a DRMO for R/T/D/S screening; or, generator-funded disposal on a DRMO service contract if PCP treated wood products survive R/T/D/S screening and are environmentally controlled by state or local regulations; or, (2) disposal as solid waste through the appropriate type landfill facility if conditions do not warrant R/T/D/S and the PCP-treated wood products(s) are not environmentally controlled by state or local regulations. NOTE: Personal liability concerns for environmental noncompliance must enter into disposal decisions.

"c. When PCP-treated wood products (which have not been containerized) are palletized for turn-in to a DRMO, generating (turn-in) activities should ensure that any available PCP-treated pallets are used for this purpose. If PCP-treated pallets are not available, generating activities are encouraged to use the servicing DRMO as a possible source for PCP-treated pallets before using non-treated standard pallets. This would also prevent the inadvertent and unnecessary expense for disposal of standard pallets on service contracts.

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"d. For further information on PCP-treated products, refer to Technical Guide No. 146, "Pentachlorophenol Materials," published by the U.S. Army Environmental Hygiene Agency (410) 671-3677 (DSN 584)."

FOR THE DIRECTOR:



RAUL A. MARTINEZ
DASC Administrator

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